

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7099 3400 0016 3134 1036

28 DEC 2004

Jim Hooper
Univar USA
66 Fleece Drive
Batavia, IL 60510

Dear Mr. Hooper:

Re: Univar USA Inc.
Omaha, Nebraska
EPA ID No. NED986375327

The final decision and response to comments for the Univar site in Omaha Nebraska is enclosed with this letter. The Statement of Basis (SOB) was made available for public comment from May 12, 2003, to June 26, 2003, and no comments were received. Therefore, the proposed remedy has not been modified and is now the selected remedy for the site.

The Environmental Protection Agency (EPA) is drafting a Corrective Measures Implementation Order (CMI) which will be sent to you in the near future. This order will formalize the performance of corrective measures chosen in the SOB.

Please contact me at (913) 551-7747 or bahnke.donald@epa.gov if you have additional questions about this letter.

Sincerely,

Don Bahnke
FFSE Branch

cc: Bill Gidley
NDEQ
Eric Tollefsrud
Geometrix

ARTD/FFSE/cas:h:/DBAHNKE/RTCCOVER.DOC/122004

FFSE *Don Bahnke*
BAHNKE
12/ 21 /04

RCAP *Don*
MURROW
12/ 21 /04

CNSL
HOEFER
12/ 22 /04
Don





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

CERTIFIED MAIL

28 DEC 2004

RETURN RECEIPT REQUESTED

Article Number: 7099 3400 0016 3134 1036

Jim Hooper
Univar USA
66 Fleece Drive
Batavia, IL 60510

Dear Mr. Hooper:

Re: Univar USA Inc.
Omaha, Nebraska
EPA ID No. NED986375327

The final decision and response to comments for the Univar site in Omaha Nebraska is enclosed with this letter. The Statement of Basis (SOB) was made available for public comment from May 12, 2003, to June 26, 2003, and no comments were received. Therefore, the proposed remedy has not been modified and is now the selected remedy for the site.

The Environmental Protection Agency (EPA) is drafting a Corrective Measures Implementation Order (CMI) which will be sent to you in the near future. This order will formalize the performance of corrective measures chosen in the SOB.

Please contact me at (913) 551-7747 or bahnke.donald@epa.gov if you have additional questions about this letter.

Sincerely,

Pat Murrow for Don Bahnke

Don Bahnke
FFSE Branch

cc: Bill Gidley
NDEQ
Eric Tollefsrud
Geometrix

FINAL DECISION AND RESPONSE TO COMMENTS

UNIVAR CORPORATION
4120 BUCKINGHAM PLACE
OMAHA, NEBRASKA
EPA IDENTIFICATION # NED986375327

INTRODUCTION

This Final Decision and Response to Comments (FD-RTC) is being presented by the U.S. Environmental Protection Agency (EPA). The purpose of this FD-RTC is to identify the selected corrective measures for implementation at the Univar Corporation facility located at 4120 Buckingham Place, Omaha, Nebraska (the "Facility", the general location of which is depicted on Figure 1), and address any issues raised during the public comment period on the Statement of Basis presented by EPA. (A Statement of Basis is an EPA document that provides a brief summary of all of the corrective measure alternatives considered for implementation at a given facility, and which highlights the key factors which led to the identification of the proposed corrective measure(s).) The public comment period on the Statement of Basis ran from May 12 through June 26, 2003.

As no comments on the corrective measures proposed in the Statement of Basis were received by EPA, EPA has selected the corrective measures as proposed in the Statement of Basis without any changes. The selected corrective measures are briefly described below.

SELECTED CORRECTIVE MEASURES

The selected corrective measures for the Facility are:

- For contaminated soils – There are two components to this action: (1) the construction and maintenance of an engineered cover over areas of the Facility where soil is contaminated; and (2) the establishment of institutional controls.
- For contaminated groundwater located on-site - Extraction through pumping, treatment, and disposal by discharge into the local sanitary sewer system.
- For contaminated groundwater migrating off-site – Contaminated groundwater has migrated off-site. The groundwater extraction, treatment, and disposal measure described above will not be effective in capturing all of this off-site groundwater. A long-term groundwater monitoring program which will include downgradient monitoring wells will be established to verify that this off-site contaminated groundwater does not reach receptors at levels of concern. Monitoring data will be used to confirm the effectiveness of natural processes in attaining media cleanup standards. In addition to monitoring, a contingency plan will be prepared. This contingency plan will provide a mechanism to invoke containment or treatment measures, if future monitoring results indicate that natural processes are insufficient to achieve media cleanup standards.

The engineered covers will be designed and constructed to create a barrier between potential receptors at the ground surface and the underlying contaminated soil, eliminating the exposure pathway. The approximate lateral extent of the engineered covers are illustrated on Figure 2. Engineered covers will be constructed directly on top of the existing ground surface within each area. The existing concrete slabs will not be demolished. Instead, fill will be placed on the ground surface to establish acceptable drainage and asphalt pavement will be constructed above the fill. The asphalt pavement will consist of three inches of asphalt and approximately nine inches of base rock.

The engineered covers will greatly limit infiltration through the contaminated soil, reducing the potential for future mobilization of contamination into the groundwater. In addition, the location of the impacted soil and the need for EPA notification, appropriate health and safety measures, and proper soil management protocols during future earthwork events in this area will be recorded at the Douglas County Registrar of Deeds. This proprietary control is expected to take the form of a restrictive covenant or easement. As Nebraska has a marketable title statute that requires certain property interests to be re-filed every 23 years to remain valid (*R.R.S. Neb. § 76-290*), a protocol for ensuring that an effective institutional control remains in place for as long as necessary must be developed. A physical barrier and warning signs will be placed around the capped area and will be maintained to help ensure that subsurface work will not be conducted without the knowledge of the property owner.

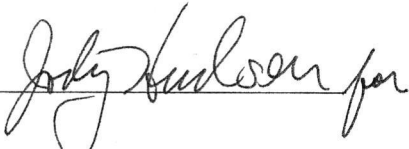
The groundwater-monitoring system will involve the construction of monitoring wells screened in the I Sand Unit downgradient of the Facility. These wells will be located based on the conceptual model of the Facility and accessibility, with specific locations proposed in the Corrective Measures Implementation Workplan. Monitoring data will be collected at a specified frequency and used to confirm the effectiveness of natural processes in attaining media cleanup standards. The duration-of-monitoring will be based on periodic statistical evaluation of trends in the groundwater data, in accordance with the Corrective Measures Implementation Workplan.

PUBLIC PARTICIPATION ACTIVITIES

EPA has met several times with the South Omaha Neighborhood Association and the Spring Lake Park Association. Results of the RCRA Facility Investigation and Corrective Measures Study have been presented to these associations and they seem satisfied with this proposal. The Statement of Basis for this Facility was made available for public comment from May 12, 2003 to June 26, 2003. No comments on the corrective measures proposed for the Facility were received.

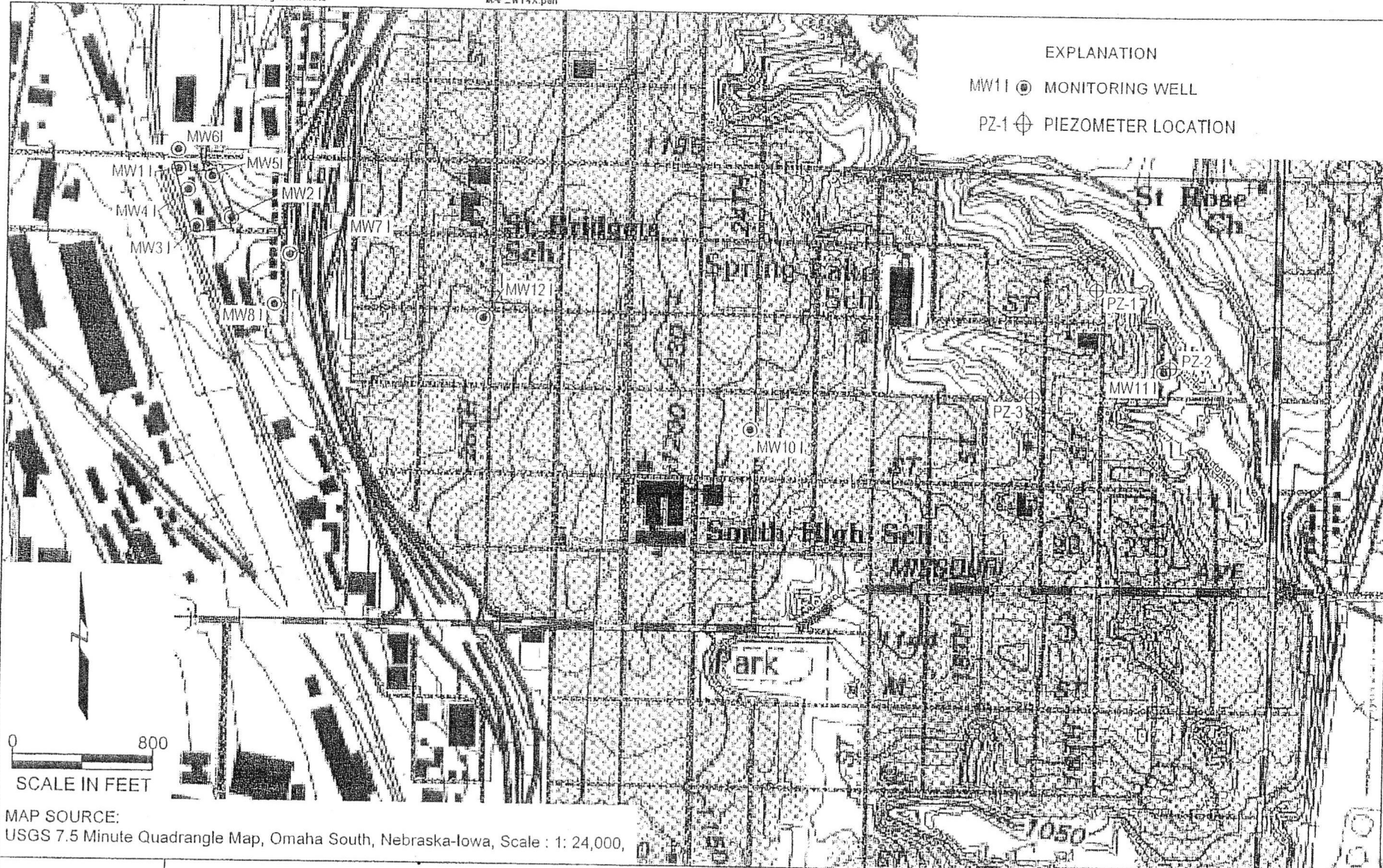
DECLARATIONS

Based on the administrative record compiled for this Facility, I have determined that the selected corrective measures for the Facility are appropriate and will be protective of human health and the environment.


12/28/04

Art Spratlin, Director
Air, RCRA, and Toxics Division

Date



EXPLANATION
 MW11 ○ MONITORING WELL
 PZ-1 ⊕ PIEZOMETER LOCATION

MAP SOURCE:
 USGS 7.5 Minute Quadrangle Map, Omaha South, Nebraska-Iowa, Scale : 1: 24,000,



SITE MAP
 4120 Buckingham Place
 Omaha, Nebraska

Project No.
 4132 H
 Figure
 1

05-02-2000 11:46
 C:\Minneapolis\4132\m4132_0000\vw_0000_fig_02.dgn
 \SFPRI\2\Splash Hold Job-fig2\m4132.ctb

Kuber

MAP_WT3Y.ctb



EXPLANATION

• PREVIOUS SAMPLING LOCATION

AREA TO BE CAPPED

AREA FOR ENGINEERED CAP

4120 Buckingham Place
 Omaha, Nebraska

Project No.
 4132

Figure



U.S. Postal Service
CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

28 DEC 2004

Postmark
Here

Postage

\$

Certified Fee

Return Receipt Fee
(Endorsement Required)

Restricted Delivery Fee
(Endorsement Required)

Total

Recipient

Street

City

Jim Hooper
Univar USA
66 Fleece Drive
Batavia, IL 60510

7099 3400 0016 9100 4ETE 1036

PLACE STICKER AT TOP OF ENVELOPE
TO THE RIGHT OF RETURN ADDRESS.
FOLD AT DOTTED LINE

SEN

HIS SECTION ON DELIVERY

- ☐ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- ☐ Print your name and address on the reverse so that we can return the card to you.
- ☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jim Hooper
Univar USA
66 Fleece Drive
Batavia, IL 60510

2. Article Number

(Transfer from service label)

7099 3400 0016 3134 1036

A. Signature

X *James P. Hooper*

☐ Agent

☒ Addressee

B. Received by (Printed Name)

JAMES P. HOOPER

C. Date of Delivery

12-31-2004

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☒ Return Receipt for Merchandise

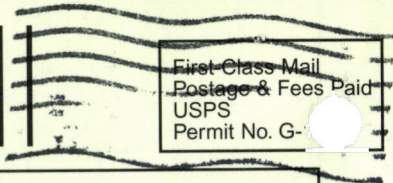
☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

UNITED STATES POSTAL SERVICE



- Sender: Please print your name, address, and ZIP+4 in this box •

United States
Environmental Protection Agency
901 N. 5th Street
Kansas City, KS 66101

RECEIVED

Bahnke - JAN 04 2005
RCAP

